

Before the
FEDERAL COMMUNICATION COMMISSION
Washington, D.C. 20554

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| | | |
|---|---|----------------------------------|
| In the Matter of |) | |
| |) | |
| Request for Review by Colegio |) | |
| Sagrada Familia |) | Form 471 Application Nos. 402642 |
| Decision of the Universal Service |) | & 402921 |
| Administrator |) | |
| Schools and Libraries Universal Service |) | CC Docket No. 02-6 |
| Support Mechanism |) | |

TO: Wireline Competition Bureau

REQUEST FOR REVIEW

Pursuant to Sections 54.719(c) and 54.721 of the Federal Communications Commission ("Commission" or "FCC") rules, 47 C.F.R. §§ 54.719(c) and 54.721 (2003), Colegio Sagrada Familia ("Colegio Sagrada Familia") hereby appeals the decision of the Schools and Libraries Division ("SLD") of the Universal Service Administrative Company to reduce the requested discount in Funding Year 2004 (07/01/2004 – 06/30/2005) from 90% to 20%.

I. BACKGROUND

On February 04, 2004, Colegio San Francisco filed a FCC Forms 471 with the SLD indicating the services for which it was requesting discounts under the schools and libraries universal service support mechanism (the "E-rate program").¹ On Block 4 of its Form 471 applications, Colegio Sagrada Familia indicated that 1028 out of 771 students enrolled during the 2004-2005 academic year qualified for a free or reduced price lunch under the National School Lunch Program ("NSLP") and requested a 90% discount on all of its funding requests.² During

¹ FCC Form 471 No. 402642 and 402621 for Colegio Sagrada Familia (Exhibit A).

² The specific funding requests numbers are 1101654, 1101667, 1101677, 1102483 and 1102493.

its review of Colegio Sagrada Familia's application, the SLD requested documentation supporting the eligible discount rate for the school.³ Specifically, the information request, which was delivered to Colegio Sagrada Familia, requested the following information:

1. The total number of enrolled.
2. Total number of surveys/applications sent out
3. Number of survey/application returned
4. Total number of students that qualifies for the National School Lunch Program, using the Income Eligibility Guidelines (IEG) of the NSLP, per returned surveys/applications
5. Are the surveys/applications and results kept on file.
6. Provide a sample copy of the FILLED OUT SURVEY/APPLICATION with the child's personal information crossed out for confidentiality.
7. A signed certification that reads: "I certify that only those students who meet the Income Eligibility of the National School Lunch Program have been included in Column 5 of item 10b, Block 4 (Worksheet A) of the Form 471."
8. The information must be in writing on the school letterhead and signed by a school official (such as the Principal, Vice – Principal Superintendent, Director of Food Services.

On January 13, 2005 Colegio Sagrada Familia provided the information requested to the SLD on the school letterhead and signed by the school Director, Sor Maria Salvador.⁴ In its response, Colegio Sagrada Familia indicated that there were 1200 students enrolled, that 1090 surveys/applications were sent out and that 773 surveys/applications were returned. It also indicates from those 773 survey/applications returned 548 students qualifies for the NSLP, that the surveys/applications and its results are kept on file and certified that only the students who meet the IEG of the NSLP had being included in Column 5 item 10b of block 4 (worksheet A)

³ See fax from , Schools and Libraries Division, Program Integrity Assurance, to Lydia Hernandez, dated December 09, 2004 (Exhibit B).

⁴ See Letter from Colegio Sagrada Familia's Director, Sor Maria Salvador to Schools and Libraries Division, Program Integrity Assurance, dated January 13, 2005 (Exhibit C).

Larry Bartholomew of the Form 471. Colegio Sagrada Familia also provided a sample copy of the socio-economic survey⁵.

On April 05, 2005, the SLD issued a funding commitment decision letter reducing the discount rate from 90% to 20%.⁶ The SLD provided as explanation on the reason for the percentage reduction the following statement: **FRN approved; modified by SLD. The site-specific discount was corrected.**

It is our assumption that the SLD established the basis for the decision of awarding a 20% discount versus the 90% originally requested on the conflicting information provided by Colegio Sagrada Familia in the submitted SLD Form 471 and the response to the PIA request for information. (Exhibit A) **Colegio Sagrada Familia submitted in filing the SLD Form 471 with inaccurate information on Block 4 column 4 (1028) and on Block 4 column 5 (771)⁷.** This number is not consistent with the information provided in the applicant response to the request of information **due to a change on the number of students enrolled after the form was filed and on the second study not all of the students complied with the survey.** (Exhibit D and Exhibit E) **Exhibit E provides the correct information (numbers) to calculate, following the FCC rules and procedures the exact number of students for Block 4, Column 4(1200) and Column 5 (960). This change in numbers qualifies Colegio Sagrada Familia for an 80% percent of discount.**

The survey, which had been provided to the SLD during the PIA review process, asked parents to provide the size of the family, the number of students enrolled in the school, and the household income. Out of the 1090 surveys distributed, 773 of the students completed the

⁵ See ESTUDIO SOCIOECONOMICO (Exhibit D)

⁶ See Letter from Schools and Libraries Division, Universal Service Administrative Company to Colegio Sagrada Familia, dated April 05, 2005 (Exhibit E)

⁷ Exhibit A

survey. From the 773 completed surveys, 548 (70.89 %) were determined to be eligible for a free or reduced price lunch under the NSLP in accordance with the Income Eligibility Guidelines of the U.S. Department of Agriculture. Following the SLD's guidelines we can get to the conclusion that in Colegio Sagrada Familia students, or 70.89 % of its student population, qualified for a free or reduced-price lunch under the NSLP. Using the discount matrix set forth in the FCC rules, a school with 70.89 % of its student population eligible for the national school lunch program qualifies for 80% discount under the schools and libraries universal service support mechanism.

II. COLEGIO SAGRADA FAMILIA CORRECTLY DETERMINED THE PERCENTAGE OF STUDENTS ELIGIBLE FOR A FREE OR REDUCED-PRICE LUNCH UNDER THE NSLP.

Although Colegio Sagrada Familia erroneously filed an SLD Form 471 with inaccurate information on Block 4, alternately, when requested submitted sufficient evidence to the PIA to demonstrate the percentage of students eligible for a free or reduced – price lunch under the NSLP. (80%)

Under the Commission's rules, the discount available to a particular school is determined by indicators of poverty and high relative cost of service.⁸ First, the level of poverty for schools is measured by the percentage of their student enrollment that is eligible for a free or reduced-price lunch under the NSLP or a federally-approved alternative mechanism outlined in Title I of the Improving America's School Act (IASA).⁹ These federally-approved alternative mechanisms include data comparable to the NSLP data that is collected through surveys. As the

⁸ 47 C.F.R. § 54.505(b).

⁹ 47 C.F.R. § 54.505(b)(1); *Federal-State Joint Board on Universal Service*, Report and Order, CC Docket No. 96-45, FCC 97-157, 12 FCC Rcd 8776, ¶¶ 508-09 (rel. May 8, 1997).

Commission has acknowledged, surveys are particularly relevant to schools that many not have access to NSLP data, such as private schools.¹⁰ Second, a school's high-cost status is derived from rules that classify it as urban or rural.¹¹ The Commission's rules provide a matrix reflecting both the school's urban or rural status and the percentage of its students who are eligible for the school lunch program to establish its discount rate, ranging from 20 percent to 90 percent.¹² Because NSLP data is unavailable for Colegio Sagrada Familia, it used a federally-approved alternative mechanism that relies on actual counts of low-income children to determine the level of poverty.

III. THE SLD ERRONEOUSLY CONCLUDED THAT COLEGIO SAGRADA FAMILIA QUALIFIED FOR A 20% DISCOUNT AND FAILED IN NOT REQUESTING ADDITIONAL INFORMATION TO THE SCHOOL AND CLARIFY THE CONFLICTING INFORMATION.

Colegio Sagrada Familia submitted to the SLD exactly what it was asked to submit: (a) the total number of students (1200 students), (b) the number of surveys/applications sent out (1090), (c) the number of surveys/applications returned (773) (d) the number of students qualified to participate in the NSLP, 548 (based on the SLD projection guidelines), (e) if the survey/applications were kept on file, yes, (f) and (g) certification that only students that meet the IEG of the NSLP have been included in Column 5, item 10b of block 4 (worksheet A) of the Form 471. In addition, Colegio San Francisco provided a sample copy of the socio-economic survey conducted by the school. No additional documentation supporting the eligible discount rate for the school was requested.

¹⁰ See School for Language and Communication Development, Order, 17 FCC Rcd 15166 (rel. Aug. 6, 2002).

¹¹ 47 C.F.R. §§ 54.505(b)(3)(i), (ii).

¹² 47 C.F.R. § 54.505(c).

IV. CONCLUSION

Colegio Sagrada Familia provided clear evidence to the SLD that it qualified for an 80% discount under the E-rate program since out of 548 students (70.89% of the student population) were eligible for a free or reduced price lunch under the NSLP. This data was collected through a survey that was conducted in accordance with the SLD's guidelines. Furthermore, the school provided the SLD with all the information that was requested during the application review process. Therefore, the SLD erred in its decision to reduce the discount rate from the requested 90% to 20% and in not granting an 80% discount to Colegio Sagrada Familia. Colegio Sagrada Familia respectfully requests that the Commission reverse the SLD's reduction on percentage discount requested and grant its application to be funded at an 80% discount.

Respectfully submitted,

COLEGIO SAGRADA FAMILIA

/s/ Sor Maria Salvador, H.S.J

Sor Maria Salvador
Director, Colegio Sagrada Familia
Box 769
Corozal, PR 00783.
Tel: 787-859-2420
Fax: 787-859-4115

May 24, 2005

**Schools and Libraries Universal Service Program
Services Ordered and Certification Form 471
Application Display**

Block 1: Billed Entity Information

Exhibit A

Applicant's Form Identifier: SAG-ARE04

471 Application Number: 402642

Cert. Postmark Date: 02/04/2004

Out of Window Letter Date: Not applicable

Funding Year: 07/01/2004 - 06/30/2005

Form Status: CERTIFIED - In Window

Billed Entity Number: 198178

RAL Date: 03/09/2004

Name: COLEGIO SAGRADA FAMILIA
Address: CARMELO APONTE ST. BOX 769
City: COROZAL **State:** PR **Zip:** 00783

Contact Name: LYDIA HERNANDEZ
Address: 206 Dr. Salas St.
City: ARECIBO **State:** PR **Zip:** 00612

Type of Application: SCHOOL

Ineligible Orgs: N

Block 3: Impact of Services Ordered in THIS Application

Number of students to be served: 1028

Number of library patrons to be served:

| SERVICE DESCRIPTION | BEFORE ORDER | AFTER ORDER |
|---|--------------|-------------|
| a. (Schools/districts/consortia only) Telephone service: How many classrooms had phone service before and after your order? | 0 | 0 |
| b. High-bandwidth voice/data/video service: How many buildings served before and after your order? | 1 | 1 |
| c. High-bandwidth voice/data/video service: Highest speed to a building before and after your order? | 1544 | 128 |
| d. Dial-up Internet connections: How many before and after your order? | 0 | 0 |
| e. Dial-up Internet connections: Highest speed before and after your order? | 0 | 0 |
| f. Direct connections to the Internet: How many before and after your order? | 1 | 1 |
| g. Direct connections to the Internet: Highest speed before and after your order? | 1544 | 128 |
| h. Internet access(for schools): How many rooms have Internet access before and after your order? | 1 | 40 |
| j. Internet Access: How many computers (or other devices) with Internet access before and after your order? | 10 | 25 |

Block 4: Worksheets

Worksheet A No: 550691

Student Count: 1028

Weighted Product (Sum. Column 8): 925.2

Shared Discount: N/A

1. School Name: COLEGIO SAGRADA FAMILIA

2. Entity Number:

198178

3. Rural/Urban: Urban

4. Student Count: 1028

5. NSLP Students: 771

6. NSLP Students/Students: 75.000%

7. Discount: 90%

8. Weighted Product: 925.2

Block 5: Discount Funding Request(s)

| | |
|---|--|
| FRN: 1101654 FCDL Date: | |
| 11. Category of Service: Telecommunications Service | 12. 470 Application Number: 377780000473020 |
| 13. SPIN: 143002711 | 14. Service Provider Name: Puerto Rico Telephone Company |
| 15. Contract Number: T | 16. Billing Account Number: 787-859-2420 |
| 17. Allowable Contract Date: 12/23/2003 | 18. Contract Award Date: |
| 19a. Service Start Date: 07/01/2004 | 19b. Service End Date: 06/30/2005 |
| 20. Contract Expiration Date: | |
| 21. Attachment #: 1 | 22. Block 4 Entity Number: 198178 |
| 23a. Monthly Charges: \$250.00 | 23b. Ineligible monthly amt.: \$.00 |
| 23c. Eligible monthly amt.: \$250.00 | 23d. Number of months of service: 12 |
| 23e. Annual pre-discount amount for eligible recurring charges (23c x 23d): \$3,000.00 | |
| 23f. Annual non-recurring (one-time) charges: \$.00 | 23g. Ineligible non-recurring amt.: \$.00 |
| 23h. Annual pre-discount amount for eligible non-recurring charges (23f - 23g): \$0.00 | |
| 23i. Total program year pre-discount amount (23e + 23h): \$3,000.00 | |
| 23j. % discount (from Block 4): 90 | |
| 23k. Funding Commitment Request (23i x 23j): \$2,700.00 | |

| | |
|--|---|
| FRN: 1101667 FCDL Date: | |
| 11. Category of Service: Internet Access | 12. 470 Application Number: 377780000473020 |
| 13. SPIN: 143022659 | 14. Service Provider Name: A New Vision in Educational Services and Materials (NEVESEM) |
| 15. Contract Number: MTM | 16. Billing Account Number: SAG03001 |
| 17. Allowable Contract Date: 12/23/2003 | 18. Contract Award Date: |

| | |
|---|---|
| 19a. Service Start Date: 07/01/2004 | 19b. Service End Date: 06/30/2005 |
| 20. Contract Expiration Date: | |
| 21. Attachment #: 2 | 22. Block 4 Entity Number: 198178 |
| 23a. Monthly Charges: \$833.00 | 23b. Ineligible monthly amt.: \$.00 |
| 23c. Eligible monthly amt.: \$833.00 | 23d. Number of months of service: 12 |
| 23e. Annual pre-discount amount for eligible recurring charges (23c x 23d): \$9,996.00 | |
| 23f. Annual non-recurring (one-time) charges: \$7,621.00 | 23g. Ineligible non-recurring amt.: \$.00 |
| 23h. Annual pre-discount amount for eligible non-recurring charges (23f - 23g): \$7,621.00 | |
| 23i. Total program year pre-discount amount (23e + 23h): \$17,617.00 | |
| 23j. % discount (from Block 4): 90 | |
| 23k. Funding Commitment Request (23i x 23j): \$15,855.30 | |

| | |
|---|---|
| FRN: 1101677 FCDL Date: | |
| 11. Category of Service: Internet Access | 12. 470 Application Number: 377780000473020 |
| 13. SPIN: 143022659 | 14. Service Provider Name: A New Vision in Educational Services and Materials (NEVESEM) |
| 15. Contract Number: MTM | 16. Billing Account Number: SAG03001 |
| 17. Allowable Contract Date: 12/23/2003 | 18. Contract Award Date: |
| 19a. Service Start Date: 07/01/2004 | 19b. Service End Date: 06/30/2005 |
| 20. Contract Expiration Date: | |
| 21. Attachment #: 2 | 22. Block 4 Entity Number: 198178 |
| 23a. Monthly Charges: \$92.00 | 23b. Ineligible monthly amt.: \$.00 |
| 23c. Eligible monthly amt.: \$92.00 | 23d. Number of months of service: 12 |
| 23e. Annual pre-discount amount for eligible recurring charges (23c x 23d): \$1,104.00 | |
| 23f. Annual non-recurring (one-time) charges: \$.00 | 23g. Ineligible non-recurring amt.: \$.00 |
| 23h. Annual pre-discount amount for eligible non-recurring charges (23f - 23g): \$0.00 | |
| 23i. Total program year pre-discount amount (23e + 23h): \$1,104.00 | |
| 23j. % discount (from Block 4): 90 | |
| 23k. Funding Commitment Request (23i x 23j): \$993.60 | |

Block 6: Certifications and Signature

24a. Schools: Y
 24b. Libraries or Library Consortia: N

 26a. Individual Technology Plan: N
 26b. Higher-Level Technology Plan(s): Y
 26c. No Technology Plan Needed:

 27a. Approved Technology Plan(s): N
 27b. State Approved Technology Plan: Y
 27c. No Technology Plan Needed:



Universal Service Administrative Company
Schools & Libraries Division

November 19, 2004

Lydia Hernandez
206 Dr. Salas St.
Arecibo, PR. 00612

Re: 471 Application # 402642 (Colegio Sagrada Familia)

You were recently sent a request for additional information needed by the Program Integrity Assurance (PIA) team to review your Form 471 Application to ensure that it is in compliance with the rules of the federal universal service program. Your response was incomplete. The information still needed to complete the review is listed below.

- A. upon review of your Form 471 application, we were not able to validate your requested discount of 90% for **Colegio Sagrada Familia**. We could only validate a discount of 80%. If you agree that this entity should be eligible for the amount of discount we could validate, please send us a written statement verifying that you accept the modification to the discount. If you choose to validate your original requested discount of 90%, then please provide the appropriate documentation to validate your requested discount percentage.

If the discount percentage was determined by information obtained from a survey/application, please provide the following information:

- 1) Total number of students enrolled
- 2) Total number of surveys/applications sent out
- 3) Number of surveys/applications returned
- 4) Total number of students qualified for NSLP per the returned surveys/applications
- 5) Are the surveys/applications and results kept on file.
- 6) Provide a sample copy of a FILLED OUT SURVEY/APPLICATION with the child's personal information crossed out for confidentiality.
- 7) A signed certification that reads: "I certify that only those students who meet the Income Eligibility Guidelines of the National School Lunch Program have been included in Column 5 of Item 10b, of Block 4 (Worksheet A) of the Form 471."
- 8) This information must be in writing on school letterhead and signed by a school official (such as the Principal, Vice-Principal, Superintendent, Director of Food Services).

If the discount was determined using a different method than what was identified above, please indicate the method that was used.

Based upon review of your Form 471 application, we were not able to validate your requested rural classification for **Colegio Sagrada Familia**. The discount percentage for an entity is based on the entity's rural/urban classification and the percentage of students that meet the income eligibility requirements of the National School Lunch Program (NSLP). If the rural classification cannot be verified, the entity will be classified as urban and the discount percentage requested will be modified. **Please provide the entity's county name and physical address (Región y Distrito Escolar).**

- E-Rate funding request numbers 1101667 and 1101677 for 471 Application 402642 may or may not contain products that are eligible or not eligible for funding, depending on how they are used. We will need some additional information in order to evaluate your funding request. Please submit the information requested below.

To aid in your response, you may wish to consult our Eligible Services List, which is available at www.sl.universalservice.org. You may also wish to check with your service provider if you are uncertain about making the certifications on this page.

In general, E-rate funds are available to provide connectivity. Other uses are not eligible for support. The products/services being requested may have some ineligible functions including but not limited to: Content filtering, network management, proxy services, caching, and Virtual Private Networks (VPN's). In order for us to further evaluate your request, please refer to the areas below and indicate the statements that apply to you.

Do you plan to use any ineligible functions as part of your request for Products or Services?

Yes _____ No X

If no, please sign and date the following statement:

I certify that we will not utilize the ineligible functions contained within the requested product or service and that we may be audited. If we are found to have used these products/services in a way that is prohibited, recovery of funds or revocation of funding commitments is a possibility.

Signature: Son Maria Solorza, MS Date: 3/4/05

If yes, the functions may be considered ancillary if they meet the following criteria.

1. The package represents the most cost-effective bid for the eligible product or service.
2. The consideration of cost-effectiveness must be made without considering ineligible features.
3. The package is a standard product offering that includes the ineligible features as an intrinsic part, with no separated pricing available.
4. Any added content must be minimal.

Did the functions meet all of the criteria? Yes _____ No _____

If yes, the ineligible function is ancillary. If no, the ineligible function is integral to the requested product or service and must be cost allocated out of the funding request.

If the ineligible functions are to be utilized and do not meet the ancillary criteria, please provide a cost allocation of the ineligible functions (to include all related costs such as installation, maintenance, taxes, etc).

The amount to be allocated out of the request is _____ for the following
ineligibles:

Name: Sor Maria Salvador

Title: Director

Date: June 3, 2005

Please fax or e-mail the requested information to my attention. If you have any questions please feel free to contact me.

It is important that we receive all of the information requested so the PIA team can complete its review. Failure to do so may result in a reduction or denial of funding.

You are being given an additional seven calendar days to respond. If we do not receive the requested information within seven calendar days, your application will be reviewed using the information currently on file.

Thank you for cooperation and continued support of the Universal Service Program.

Sincerely,

Larry Bartholomew
Schools & Libraries Division
Program Integrity Assurance
973-581-6754 Voice
973-599-6578 FAX
Email: lbartho@sl.universalservice.org

Colegio Sagrada Familia

Box 769

Corozal, Puerto Rico 00783

To : Larry Bartholomew
PIA Reviewer Fax: 973-599-6578

From : Sor María Salvador
Director
Colegio Sagrada Familia

Date : January 13, 2005

Subject : Application Numbers 402642 & 402921

The discount percentage was determined by information obtained from a Survey/application method. Results were as follow:

Total number of students enrolled - 1200

Total number of surveys/applications sent out - 1090

Number of surveys/applications returned - 773

Total number of students qualified for NSLP per the returned surveys/applications – 548

Are the surveys/applications and results kept on file – Yes

Copy of a FILLED OUT SURVEY/APPLICATION – annex 1

Signed certification – annex 2

Exhibit C

1. Región Educativa Moravia 2. Distrito Escolar Corozal

3. Escuela C.S.F. 4. Grado 2^{do} - PK

5. Nombre del estudiante Elías Rodríguez, Anany - Antonio

6. Nombre del padre o encargado Antonio I Elias Cintron

Ocupación Comerciante

Ingreso Anual 30.000.

7. Nombre de la madre Vilmary Rodriguez Vazquez

Ocupación Comerciante

Ingreso Anual 1600

8. Total Ingreso Anual Familiar \$ _____

9. Total Miembros de la Familia 5

Certifico Correcto: 100%

(Firma padre o encargado)

Fecha: 21 Mayo 2015

(Firma Maestro)

Exhibit D

Colegio Sagrada Familia

Box 769

Corozal, Puerto Rico 00783

Certification

"I certify that only those students who meet the Income Eligibility Guidelines of the National School Lunch Program have been included in column 5 of the Item 10b, of Block 4 (worksheet A) of the Form 471."

Sor María Salvador, HSJ

Sor María Salvador

Director

Colegio Sagrada Familia

January 13, 2005

Date



Universal Service Administrative Company
Schools & Libraries Division

FUNDING COMMITMENT DECISION LETTER

(Funding Year 2004: 07/01/2004 - 06/30/2005)

April 5, 2005

Exhibit E

LYDIA HERNANDEZ
COLEGIO SAGRADA FAMILIA
206 Dr. Salas St.
ARECIBO, PR 00612

Re: Form 471 Application Number: 402642
Funding Year 2004: 07/01/2004 - 06/30/2005
Billed Entity Number: 198178
Applicant's Form Identifier: SAG-ARE04

Thank you for your Funding Year 2004 E-rate application and for any assistance you provided throughout our review. Here is the current status of the funding request(s) featured in the Funding Commitment Report at the end of this letter.

- The amount, \$4,344.20 is "Approved."

Please refer to the Funding Commitment Report on the page following this letter for specific funding request decisions and explanations.

The Important Reminders and Deadlines immediately preceding this letter are provided to assist you throughout the application process.

NEXT STEPS

- Review technology planning approval requirements
- Review CIPA Requirements
- File Form 486
- Invoice the SLD using the Form 474 (service providers) or Form 472 (Billed Entity)

FUNDING COMMITMENT REPORT

On the pages following this letter, we have provided a Funding Commitment Report for the Form 471 application cited above. The enclosed report includes a list of the Funding Request Number(s) (ERNs) from your application. The SLD is also sending this information to your service provider(s) so preparations can be made to begin implementing your E-rate discount(s) after you file your Form 486. Immediately preceding the Funding Commitment Report, you will find a guide that provides a definition for each line of the Report.

TO APPEAL THIS DECISION:

If you wish to appeal the decision indicated in this letter, your appeal must be received by the SLD or postmarked within 60 days of the date of this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. In your letter of appeal:

1. Include the name, address, telephone number, fax number, and e-mail address (if available) for the person who can most readily discuss this appeal with us.
2. State outright that your letter is an appeal. Identify which Funding Commitment Decision(s) you are appealing. Indicate the relevant funding year and the date of the FCRL. Your letter of appeal must also include the Billed Entity Name, the

Form 471 Application Number, and the Billed Entity Number from the top of your letter.

3. When explaining your appeal, copy the language or text from the Funding Commitment Report that is at the heart of your appeal, to allow the SLD to more readily understand your appeal and respond appropriately. Please keep your letter to the point, and provide documentation to support your appeal. Be sure to keep copies of your correspondence and documentation.
4. Provide an authorized signature on your letter of appeal.

If you are submitting your appeal on paper, please send your appeal to: Letter of Appeal, Schools and Libraries Division, Box 125 - Correspondence Unit, 80 South Jefferson Road, Whippany, NJ 07981. Additional options for filing an appeal can be found in the "Appeals Procedure" posted in the Reference Area of the SLD web site or by contacting the Client Service Bureau. We encourage the use of either the e-mail or fax filing options.

While we encourage you to resolve your appeal with the SLD first, you have the option of filing an appeal directly with the Federal Communications Commission (FCC). You should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. Your appeal must be received by the FCC or postmarked within 60 days of the above date on this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. If you are submitting your appeal via United States Postal Service, sent to: FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554. Further information and options for filing an appeal directly with the FCC can be found in the "Appeals Procedure" posted in the Reference Area of the SLD web site or by contacting the Client Service Bureau. We strongly recommend that you use either the e-mail or fax filing options.

NOTICE ON RULES AND FUNDS AVAILABILITY

Applicants' receipt of funding commitments is contingent on their compliance with all statutory, regulatory, and procedural requirements of the Schools and Libraries Universal Service Support Mechanism. Applicants who have received funding commitments continue to be subject to audits and other reviews that USAC and/or the FCC may undertake periodically to assure that funds that have been committed are being used in accordance with all such requirements. The SLD may be required to reduce or cancel funding commitments that were not issued in accordance with such requirements, whether due to action or inaction, including but not limited to that by the SLD, the applicant, or the service provider. The SLD, and other appropriate authorities (including but not limited to USAC and the FCC), may pursue enforcement actions and other means of recourse to collect erroneously disbursed funds. The timing of payment of invoices may also be affected by the availability of funds based on the amount of funds collected from contributing telecommunications companies.

Schools and Libraries Division
Universal Service Administrative Company

FUNDING COMMITMENT REPORT

Form 471 Application Number: 402921
Funding Request Number: 1102483 Funding Status: As Yet Unfunded
Services Ordered: Internal Connections
SPIN: 143022659 Service Provider Name: A New Vision in Educational Ser
Contract Number: One Time
Billing Account Number: SAG03001
Service Start Date: 07/01/2004
Contract Expiration Date: 09/30/2005
Site Identifier: 198178
Annual Pre-discount Amount for Eligible Recurring Charges:
Annual Pre-discount Amount for Eligible Non-recurring Charges:
Pre-discount Amount:
Discount Percentage Approved by the SLD:
Funding Commitment Decision:

Funding Request Number: 1102493 Funding Status: As Yet Unfunded
Services Ordered: Internal Connections
SPIN: 143022659 Service Provider Name: A New Vision in Educational Ser
Contract Number: One Time
Billing Account Number: SAG03001
Service Start Date: 07/01/2004
Contract Expiration Date: 09/30/2005
Site Identifier: 198178
Annual Pre-discount Amount for Eligible Recurring Charges:
Annual Pre-discount Amount for Eligible Non-recurring Charges:
Pre-discount Amount:
Discount Percentage Approved by the SLD:
Funding Commitment Decision:

Form 471 Application Number, and the Billed Entity Number from the top of your letter.

3. When explaining your appeal, copy the language or text from the Funding Commitment Report that is at the heart of your appeal, to allow the SLD to more readily understand your appeal and respond appropriately. Please keep your letter to the point, and provide documentation to support your appeal. Be sure to keep copies of your correspondence and documentation.
4. Provide an authorized signature on your letter of appeal.

If you are submitting your appeal on paper, please send your appeal to: Letter of Appeal, Schools and Libraries Division, Box 125 - Correspondence Unit, 80 South Jefferson Road, Whippany, NJ 07981. Additional options for filing an appeal can be found in the "Appeals Procedure" posted in the Reference Area of the SLD web site or by contacting the Client Service Bureau. We encourage the use of either the e-mail or fax filing options.

While we encourage you to resolve your appeal with the SLD first, you have the option of filing an appeal directly with the Federal Communications Commission (FCC). You should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. Your appeal must be received by the FCC or postmarked within 60 days of the above date on this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. If you are submitting your appeal via United States Postal Service, sent to: FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554. Further information and options for filing an appeal directly with the FCC can be found in the "Appeals Procedure" posted in the Reference Area of the SLD web site or by contacting the Client Service Bureau. We strongly recommend that you use either the e-mail or fax filing options.

NOTICE ON RULES AND FUNDS AVAILABILITY

Applicants' receipt of funding commitments is contingent on their compliance with all statutory, regulatory, and procedural requirements of the Schools and Libraries Universal Service Support Mechanism. Applicants who have received funding commitments continue to be subject to audits and other reviews that USAC and/or the FCC may undertake periodically to assure that funds that have been committed are being used in accordance with all such requirements. The SLD may be required to reduce or cancel funding commitments that were not issued in accordance with such requirements, whether due to action or inaction, including but not limited to that by the SLD, the applicant, or the service provider. The SLD, and other appropriate authorities (including but not limited to USAC and the FCC), may pursue enforcement actions and other means of recourse to collect erroneously disbursed funds. The timing of payment of invoices may also be affected by the availability of funds based on the amount of funds collected from contributing telecommunications companies.

Schools and Libraries Division
Universal Service Administrative Company

FUNDING COMMITMENT REPORT

Form 471 Application Number: 402642
Funding Request Number: 1101654 Funding Status: Funded
Services Ordered: Telecommunications Service
SPIN: 1430027.1 Service Provider Name: Puerto Rico Telephone Company
Contract Number: T
Billing Account Number: 787-859-2420
Service Start Date: 07/01/2004
Contract Expiration Date: 06/30/2005
Site Identifier: 198178
Annual Pre-discount Amount for Eligible Recurring Charges: \$3,000.00
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$3,000.00
Discount Percentage Approved by the SLD: 20%
Funding Commitment Decision: \$600.00 - FRN approved; modified by SLD
Funding Commitment Decision Explanation: The site-specific discount was corrected based on incomplete survey results submitted.

Funding Request Number: 1101667 Funding Status: Funded
Services Ordered: Internet Access
SPIN: 143022659 Service Provider Name: A New Vision in Educational Ser
Contract Number: MTM
Billing Account Number: SAG03001
Service Start Date: 07/01/2004
Contract Expiration Date: 06/30/2005
Site Identifier: 198178
Annual Pre-discount Amount for Eligible Recurring Charges: \$9,996.00
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$7,621.00
Pre-discount Amount: \$17,617.00
Discount Percentage Approved by the SLD: 20%
Funding Commitment Decision: \$3,523.40 - FRN approved; modified by SLD
Funding Commitment Decision Explanation: The site-specific discount was corrected based on incomplete survey results submitted.

Funding Request Number: 1101677 Funding Status: Funded
Services Ordered: Internet Access
SPIN: 143022659 Service Provider Name: A New Vision in Educational Ser
Contract Number: MTM
Billing Account Number: SAG03001
Service Start Date: 07/01/2004
Contract Expiration Date: 06/30/2005
Site Identifier: 198178
Annual Pre-discount Amount for Eligible Recurring Charges: \$1,104.00
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$1,104.00
Discount Percentage Approved by the SLD: 20%
Funding Commitment Decision: \$220.80 - FRN approved; modified by SLD
Funding Commitment Decision Explanation: The site-specific discount was corrected based on incomplete survey results submitted.